

**THE UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

ZEO HEALTH LTD.,	§	
MICAH PORTNEY,	§	
TOUCHSTONE LIFE ESSENTIALS, INC.,	§	
and NORWOOD E. STONE,	§	Case No. 2:21-cv-11410 (ES) (MF)
	§	
Plaintiffs,	§	JURY TRIAL DEMANDED
	§	
vs.	§	
	§	
ZOI GLOBAL, LLC,	§	
LORI R. LEE, DENISE STEPHENS,	§	
METRON NUTRACEUTICALS, LLC, and	§	
NIKOLAOS TSIRIKOS-KARAPANOS,	§	
	§	
Defendants.	§	

DECLARATION OF ANYA ENGEL

I, Anya Engel, declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. I am over twenty-one years of age and have personal knowledge of the following facts or access to information and/or records allowing me to confirm these facts.

2. I am an attorney with the law firm of Keyhani LLC and represent Plaintiffs Zeo Health, Ltd., Micah Portney, Touchstone Life Essentials, Inc., and Norwood E. Stone (collectively, “Plaintiffs”).

3. I submit this declaration in support of Plaintiffs’ Response in Opposition to Defendants Metron Nutraceuticals, LLC and Dr. Nikolaos Tsirikos-Karapanos’s Brief in Support of Motion to Dismiss (Dkt. #13).

4. Attached hereto as Exhibit A is a true and correct copy of screenshots taken from the zoiglobal.com website, the Wellness Center of Northwest Jersey website, the Zoi Global Facebook page, the Wellness Center of Northwest Jersey Facebook page, and Defendant Lori Lee's LinkedIn page accessed on various dates, including September 20, 2021.

5. I, along with my co-counsel Dariush Keyhani and Frances Stephenson, accessed the Zoi Global website by typing "www.zoiglobal.com" into each of our individual computers' browsers on multiple dates, including August 12, 2021. When directed to the website, all of the website's pages, including the homepage and pages containing Defendants' comparison videos, feature a link in the upper left hand corner stating: "WELCOME FROM: LORI R. LEE, MA, RDN, CPT, CLT FUNCTIONAL REGISTERED DIETITIAN NUTRITIONIST" (as seen in Exhibit A). Additionally, the website's "CONTACT" tab leads to a web page featuring a photograph of Ms. Lee, along with links to Ms. Lee's contact information in New Jersey and provides no contact information for any other individual or entity (as seen in Exhibit A).

Executed on: September 20, 2021

s/ Anya Engel